

Submitter No: 750

Submitter Name: SDC

Date Received: 12/9 /17

Summary of evidence of Ian Evans

- 1 My name is Ian Evans and I am employed by the Southland District Council (**SDC**) as its Strategic Water and Waste Manager.
- 2 SDC is responsible for the operation and maintenance, renewal and upgrading of 19 Community wastewater schemes, 20 community and stock water supplies and 27 community stormwater schemes. Given the amount of individual consents held and the anticipated further consents being issued for the stormwater activity and potentially closed landfills, the SDC is likely to be impacted heavily by the rules within the proposed Southland Water and Land Plan (**pSWLP**), both in financial and non-financial terms.
- 3 It is therefore important that the anticipated costs reflect the benefit that they are expected to deliver.
- 4 The evidence I have submitted gives a range of examples from a SDC perspective. It is fair to say that the concerns and issues that I have raised are similar across all three of the Territorial Local Authorities (**TLAs**) although the emphasis or focus is likely to be different given the nature of activity and infrastructure across the three organisations.
- 5 In terms of compliance with limits imposed through our wastewater resource consents SDC's recent performance shows a continuously improving trend. For example in recent years' compliance has been reported at 89% for 2013/14, 93.5% for 2014/15, 95% for 2015/16 and 98% for the first half of the 2016/17 year.
- 6 SDC is conscious of the importance of ensuring potential impact on Māori is taken into consideration when planning for infrastructure upgrades and have developed a strong working relationship with Te Ao Mārama Incorporated, as the agency recognised to represent Te Runanga O Ngāi Tahu on such matters. Given their close interest in water Te Ao Mārama Incorporated will always be consulted, when undertaking significant infrastructure projects.
- 7 The TLAs recognise the need to improve water quality across the region and that everyone has a role to play in how this is delivered. However there are concerns that the way the pSWLP proposes to manage discharges from critical infrastructure, because this will not achieve the desired outcome and has the potential to have a significant impact on community affordability.

Critical Infrastructure

- 8 As providers of critical infrastructure the TLAs are all concerned that its importance is not appropriately recognised within the pSWLP. Some of the objectives, policies and rules can be viewed as not providing for the ongoing expected use of such critical community infrastructure.
- 9 This infrastructure plays a key role in providing for the health and wellbeing of the TLAs' ratepayers, as well as environmental protection, and enabling economic development across the region. From a SDC perspective, one key example of the importance of infrastructure in promoting economic development can be seen in Te Anau where the level of tourism growth would likely be considerably restricted were it not for the provision of high quality infrastructure.

Policy 14 - Preference for Discharge to Land

- 10 In respect of Policy 14 acknowledging the preference for discharges to land over discharges to water I would comment that SDC does operate a number of land based wastewater discharges and will always consider land based disposal options during the resource consenting process as evidenced by the recently granted Te Anau wastewater consent. However I would comment that land based discharges are not always achievable or practicable, certainly year round discharges in some areas where soil conditions may not suit. Where these are not possible provision is needed within the rules framework to allow some form of appropriate discharge to water to be considered on a discretionary basis.

Rule 33 – Community Sewerage Schemes

- 11 Classifying wastewater discharges as non-complying activities either under Rule 6 or Rule 33 fails to provide for the direct benefits that reticulated networks provide to communities as well as to the environment. While there is more that could be done, matters such as impact on ratepayers, and overall timing of upgrades is critical to ensure the right balance is struck. A number of locations across the District where water is degraded upstream of discharges it is important that the timing of any upgrade to SDC systems is timed to ensure they deliver the biggest and most lasting environmental benefit. With this in mind SDC is currently looking at a way of prioritising future upgrades to ensure this is delivered.

Policy 24, 25, 42 and Rules Related to Community Water Supplies

- 12 The TLAs are supportive of any approach which provides certainty around provision of water supply for domestic needs given the importance of water both in terms of public health and economic development. While recognising this strategic importance the TLAs are also mindful of the need to ensure that the taking of water for all uses is managed in a long term sustainable manner. In my evidence I have specifically referred to an instance whereby SDC incurred a significant cost to source a new supply from a different location because the aquifer was over allocated. The TLAs all understand the need for demand management and have steps in place to minimise impact. These range from leakage detection and repair programmes, strategic metering on parts of our networks, to full scale renewal of aged infrastructure. An example of this is the current investment of close to \$2million for replacement water mains in Winton.

Rule 52 - Water abstraction, damming, diversion and use from the Waiau catchment

- 13 Rule 52 is one of the rules in the Plan which impacts SDC alone as it relates to taking of water from the Waiau Catchment. Of specific concern is that as our towns grow (in particular Te Anau and to a lesser extent Manapouri) the need to provide additional water is likely to eventuate in the future. SDC are concerned that under this rule it is likely to make it more difficult to apply for a consent or that this could stifle growth in these communities, particularly given the insignificant volume that these represent when compared to the flow within the catchment, as raised in my evidence. While I believe that it may not have been the intent to capture these water takes under this rule I do also believe that it is more appropriate that the community water takes are adequately and appropriately covered under Rule 50.

14 Comment on Query from Commissioner

- 15 In my evidence I also refer to a Commissioner query as to why certain water supplies were omitted from Appendix J – Drinking Water Protection Zones. It is my understanding that the supplies referred to in Appendix J only include water takes serving a population of over 500. The query by the Commissioner specifically related to the Manapouri water take which serves a population of less than 500 and is therefore not required to be included. On reviewing the SDC water takes the recently constructed Edendale / Wyndham water supply serves a population of greater than 500 and therefore should be included in the list of SDC Drinking Water Protection Zones.

Conclusion

- 16 It is recognised that all parties have a part to play in improving water quality. This can come with some significant financial cost to our communities and it is imperative that the benefit derived from this investment clearly represents value for money and takes into account affordability, especially for communities with ageing and declining populations. There should also be a much greater recognition of the benefits derived from critical infrastructure and provision clearly made for the operation, maintenance and upgrading of that infrastructure which is essential, and needed long-term. The pSWLP currently fails to recognise and account for this appropriately in the ways I have outlined.